REMARKS

Applicant respectfully requests consideration of the subject application as amended herein. This Amendment is submitted in response to the Office Action mailed November 11, 2007. Claims 1-3, 5-23, 25-38, 40-48, 50-54, 57 and 58 stand rejected. In this Amendment, claims 1, 21, 34 and 45 have been amended. No new matter has been added. Claim 57 has been canceled without prejudice.

Declaration Under 37 C.F. R. 1.131

The Examiner has considered the declaration filed on October 15, 2007 but found it ineffective to overcome the Dodrill reference. In particular, the Examiner asserts that the evidence submitted is insufficient to establish a reduction to practice of the invention prior to the effective date of the Dodrill reference. Applicant respectfully disagrees.

Applicant resubmits the Declaration previously submitted on October 15, 2007, including Exhibits A, B and C. Applicant respectfully submits that Exhibits B and C provide sufficient evidence to establish a reduction to practice of the invention prior to the effective date of the Dodrill reference. Exhibit B includes a title page of a Product Requirements Document (PRD) for NOCpulse Internet Operational Support Service. The title page provides the date of the PRD, which is August 30, 2000 (see language "Draft Version 8.30.00," where "8.30.00" is the date of the PRD).

The PRD is an 80-page document fully describing the operation of the NOCpulse service. A copy of the PRD is submitted herewith to illustrate the level of technical implementation detail that can only be provided after the product's implementation. In fact, page 4 of the PRD specifically states that "[t]his document defines NOCpulse's Internet Operational Support System (IOSS) **in technical implementation detail.**" Furthermore, screenshots of GUIs generated by NOCpulse confirm that NOCpulse was implemented and fully operational at the time the PRD was written (e.g., see pages 8, 18, 20, 22, 25, 27, 29, 31, 33-35, 37, 38, 39, 40, 43,

45, 47, 48, 50, 51, 52, 54, 55, etc.). Moreover, the PRD describes NOCpulse as implemented and fully operational system (e.g., see "Realtime and Historical Infrastructure Reporting," pages 7-8).

Exhibit C of the declaration includes page 10 of the PRD. Page 10 states that "NOCpulse has integrated the Telamon Telalert system to handle notifications of customers." Page 10 further describes the Telalert system, which provides the functionality of the presently claimed invention (see specification of the present application, e.g., pages 7 through 13, poages 16 through 18, etc.).

Accordingly, the PRD includes the publication date (August 30, 2000), which precedes the date of the Dodrill reference, and illustrates that NOCpulse was implemented, fully operational, and had integrated the Telealert system prior to the date of the PRD. Thus, the PRD provides sufficient evidence to establish a reduction to practice of the invention prior to the effective date of the Dodrill reference, i.e., October 19, 2000.

Rejections Under 35 U.S.C. §103(a)

The Examiner rejected claims 1, 3, 5-15, 18, 21, 23, 25-29, 31, 34, 37, 38, 40, 41, 45, 47, 48, 50, 57 and 58 under 35 U.S.C. §103(a) as being unpatentable over Dodrill, et al., (U.S. Patent No. 7,069,309, hereinafter "Dodrill") in view of Yunzhou Li, (U.S. Patent Application No. 2002/0071442, hereinafter "Yunzhou Li") in view of Jim Li, (U.S. Patent No. 6,012,088, hereinafter "Jim Li") and further in view of Hemzal, (U.S. Patent No. 6,542,595, hereinafter "Hemzal"). Claims 2, 22, 36 and 46 are rejected under 35 U.S.C. §103(a) as being unpatentable over the combination of Dodrill, Yunzhou Li, Jim Li and Hemzal and further in view of Cohen, (U.S. Patent No. 4,837,798, hereinafter "Cohen"). Claim 16 is rejected under 35 U.S.C. §103(a) as being unpatentable over the combination of Dodrill, Yunzhou Li, Jim Li and Hemzal, as applied to claim 1 above, and further in view of Elliott, (U.S. Patent No. 7,145,898, hereinafter "Elliott"). Claims 17, 30, 43 and 53 are rejected under 35 U.S.C. §103(a) as being unpatentable over the combination of Dodrill, Yunzhou Li, Jim Li and Hemzal, as applied to claims 1, 21 and

34 above, and further in view of Lewish, et al., (U.S. Patent No. 6,266,661, hereinafter "Lewish"). Claims 19, 32 and 35 are rejected under 35 U.S.C. §103(a) as being unpatentable over the combination of Dodrill, Yunzhou Li, Jim Li and Hemzal, as applied to claims 1, 21 and 34 above, and further in view of Anuff, (U.S. Patent No. 6,327,628, hereinafter "Anuff"). Claims 20, 33, 44 and 54 are rejected under 35 U.S.C. §103(a) as being unpatentable over the combination of Dodrill, Yunzhou Li, Jim Li and Hemzal, as applied to claims 1, 21 and 34 above, and further in view of Olsen, (U.S. Patent No. 6,519,642, hereinafter "Olsen"). Claims 42, 51 and 52 are rejected under 35 U.S.C. §103(a) as being unpatentable over the combination of Dodrill, Yunzhou Li, Jim Li and Hemzal, as applied to claims 34 and 40 above, and further in view of Huebsch, et al., (U.S. Patent No. 7,127,535, hereinafter "Huebsch").

With respect to Dodrill, as discussed above, the presently claimed invention predates the Dodrill reference because the presently claimed invention was reduced to practice prior to October 19, 2000, i.e., the effective filing date of the Dodrill reference. Accordingly, Applicant respectfully requests that the Examiner no longer consider the Dodrill reference as prior art for the presently claimed invention.

With respect to Yunzhou Li, the effective filing date of this reference is December 7, 2000. As discussed above, the presently claimed invention was reduced to practice prior to October 19, 2000, i.e., before the effective filing date of the Yunzhou Li reference. Consequently, the presently claimed invention predates the Yunzhou Li reference. Applicant respectfully requests that the Examiner no longer consider the Yunzhou Li reference as prior art for the presently claimed invention.

Notwithstanding the above arguments regarding Dodrill and Yunzhou Li, applicant respectfully submits that all cited references taken alone or in combination do not teach or suggest the presently claimed invention. Claim 1 recites as follows:

1.   A computer-implemented method comprising:
        validating configuration information specified by at least one user for a plurality of
            business sites, the configuration information pertaining to alert messages to be

sent to a plurality of destinations via a plurality of notification methods, the configuration information defining groups of destinations from the plurality of destinations to facilitate transmission of alert messages to destinations in a group via a single command;

storing the validated configuration information concerning the plurality of business sites in a database, wherein the database associates each of the plurality of destinations with one or more of the plurality of notification methods, and further associates each destination group with one or more of the plurality of the notification methods;

extracting at least a subset of the configuration information from the database based on an extraction parameter identifying one of the plurality of business sites; and

generating a text-based configuration file containing the extracted configuration information for the one of the plurality of business sites.

The newly-added limitations "the configuration information defining groups of destinations from the plurality of destinations to facilitate transmission of alert messages to destinations in a group via a single command" and "the database ... further associates each destination group with one or more of the plurality of the notification methods" are supported by various portions of the specification of the present application (see, for example, paragraphs [0055], [0056], [0071], [0072], etc.).

With respect to Dodrill, it discloses a mechanism for requesting an event notification over a network. At most, Dodrill discloses storing notification preferences of a user in a database used by a notification server to determine user preferences, where user preferences merely specify which devices (e.g., a pager) the user wishes to use to receive a notification. Dodrill is completely silent about validating configuration information prior to storing it in a database, extracting a subset of the configuration information from the database, and generating a text-based configuration file containing the extracted configuration information. More specifically, Dodrill does not teach or suggest at least the following claimed features of the present invention:

(a) validating configuration information specified for a plurality of business sites, where the configuration information defines groups of destinations to facilitate transmission of alert messages to destinations in a group via a single command;

(b) storing the validated configuration information concerning the plurality of business sites in a database, where the database each destination group with one or more of the plurality of the notification methods;

(c) extracting at least a subset of the configuration information from the database based on an extraction parameter identifying a specific business site; and

(d) generating a text-based configuration file containing the extracted configuration information for the specific business site.

With respect to Yunzhou Li, it discloses a mechanism for aggregating multicast interfaces. The Examiner asserts that paragraph 2 of "Yunzhou Li discloses extracting at least a subset of the configuration information from the database based on an extraction parameter identifying one of a plurality of business sites" (page 3 of Office Action dated November 9, 2007). Applicant respectfully disagrees. Paragraph 2 of Yunzhou Li is as follows:

> [0002] Multicasting is a well-know method of transmitting information to selected groups of users across a network, such as the Internet. For example, the transmission of an e-mail message to a group of users, each user being listed on a mailing list, uses multicasting principles. Video conferencing and teleconferencing also use multicasting principles and, accordingly, are often referred to as "multi-conferencing."

Applicant respectfully submits that neither the cited paragraph of Yunzhou Li nor any other portion of Yunzhou Li teaches or suggests extracting at least a subset of the configuration information from the database based on an extraction parameter identifying one of a plurality of business sites, as required by claim 1. Moreover, Applicant submits that Yunzhou Li does not teach or suggest any of the pertinent features of the presently claimed invention, and in particular, Yunzhou Li lacks at least the same features of the presently claimed invention that are missing from Dodrill.

With respect to Jim Li, it discloses automatically configuring an Internet access device using configuration data downloaded from a configuration server. Similarly to Yunzhou Li, Jim Li lacks at least the same features of the presently claimed invention that are missing from

Dodrill.

The above features of the present invention are also missing from each of Hemzal, Cohen, Elliott, Lewish, Anuff, Olsen, and Huebsch. Therefore, the cited references, taken alone or in combination, do not teach or suggest the present invention as claimed in claims 1, 21, 34 and 45, and their corresponding dependent claims including claims 16, 17, 19, 20, 30, 32-35, 40, 42-44, and 51-54.

Applicant respectfully requests the withdrawal of the rejection under 35 U.S.C. §103(a), and submits that the pending claims are in condition for allowance.

If the Examiner believes a telephone interview would expedite the prosecution of this application, the Examiner is invited to contact Marina Portnova at (408) 720-8300.

If there are any additional charges, please charge our Deposit Account No. 02-2666.

Respectfully submitted,

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Dated: February 8, 2008

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